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4 *Interim Co-Lead Consumer Class Counsel*
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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**

13 MAXIMILIAN KLEIN, et al.,
14

15 Plaintiffs,

16 vs.

17 META PLATFORMS, INC.,
18

Defendant.

19 This Document Relates To: All Actions
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Consolidated Case No. 3:20-cv-08570-JD

**DECLARATION OF KEVIN Y. TERUYA IN
SUPPORT OF CONSUMER PLAINTIFFS'
REPLY IN FURTHER SUPPORT OF
MOTION FOR CLASS CERTIFICATION
AND APPOINTMENT OF CLASS
COUNSEL**

The Hon. James Donato

Hearing Date: Dec. 14, 2023 at 10:00 a.m.

I, Kevin Y. Teruya, declare:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan, LLP (“Quinn Emanuel”). I serve as Interim Co-Lead Consumer Class Counsel for the Consumer Class in this action. I have been actively involved in this action, am familiar with the proceedings, and have personal knowledge of the matters stated herein.

2. I respectfully submit this declaration in support of Consumer Plaintiffs’ Reply in Further Support of Motion for Class Certification and Appointment of Class Counsel. Attached to this declaration are true and correct copies of **Exs. 1–9**, which are documents and deposition transcripts that Consumer Plaintiffs cite in their Reply. For the Court’s convenience, the relevant portions of the documents and deposition transcripts have been highlighted and, where applicable, excerpted.¹

<u>Ex. No.</u>	<u>Description of Exhibit</u>	<u>Provisionally Filed Under Seal</u>
1	Excerpts of October 29, 2020 Form 10-Q of Facebook, Inc. filed with the Securities and Exchange Commission	No
2	“ <i>Restrictions on Privacy and Exploitation in the Digital Economy: A Market Failure Perspective</i> ,” Nicholas Economides & Ioannis Lianos (Jan. 27, 2021)	No
3	September 1, 2023 Email from Facebook Counsel	No
4	Excerpts from the Deposition Transcript of Dr. Nicholas Economides, taken in <i>Klein v. Meta Platforms</i> on Sept. 14, 2023	Yes
5	Excerpts from the Deposition Transcript of Dr. Joseph Farrell, taken in <i>Klein v. Meta Platforms</i> on Sept. 22, 2023	Yes
6	Excerpts from the Deposition Transcript of Dr. Catherine Tucker, taken in <i>Klein v. Meta Platforms</i> on Sept. 7, 2023	Yes
7	Deposition Transcript of Maximilian Klein, taken in <i>Klein v. Meta Platforms</i> on May 31, 2023	Yes
8	Deposition Transcript of Sarah Grabert, taken in <i>Klein v. Meta Platforms</i> on April 24 and 25, 2023	Yes
9	Deposition Transcript of Rachel Banks Kupcho, taken in <i>Klein v. Meta Platforms</i> on May 22, 2023	Yes

¹ Should the Court find it helpful, Consumers can submit any excerpted materials in full.

1 I declare under penalty of perjury under the laws of the United States that the foregoing is
2 true and correct.

3 Executed on this 3rd day of November 2023 in Los Angeles, California.

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5 By /s/ Kevin Y. Teruya

6 Kevin Y. Teruya
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